

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

Angela E. Lockett  
25326 Wesley  
Farmington Hills m. 48336 Plaintiff(s),

Case: 2:12-cv-11064  
Judge: Roberts, Victoria A.  
MJ: Hluchaniuk, Michael J.  
Filed: 03-09-2012 At 11:59 AM  
CMP LOCKETT V WILLIAM BEAUMONT HOSP  
ITAL, ET AL (EB)

v.  
William Beaumont Hospital and Kathy Grady  
~~3601~~ West ~~13~~ mile Rd  
Royal Oak, m. 48073

Defendant(s).

## Civil Complaint

I had been employed at William Beaumont Hospital for approx., 20+ yrs. During this time, I have had excellent evaluations and I had gone from a transcriptionist to a supervisor in various areas of the hospital. In October 2010 my father was diagnosed with cancer. Subsequently, as his daughter, I took on the responsibilities of his care. I had submitted FMLA papers, which should have afforded me the opportunity to care for him in the manner that he deserved.

Unfortunately, however, my Director didn't see it that way. She told me that I should put him in a home so that I wouldn't miss time from work to take him to his appointments. Naturally, her statement was disturbing.

When I would need to leave early or stay home, it was always a problem. My work hours were from 7A - 3<sup>30</sup> p. However, my Director would schedule meetings @ 3<sup>30</sup> that usually ran until 5p. She knew that at 4p my Sitter would be unavailable, hence, I would not be able to make most of her late meetings. I had asked her if I could use unpaid time off utilizing my FMLA and I was told "no". She made me stress-out. I was scared to ask for my time, hence, she pressured me to work harder and more frequently. One day 14 hours.

Because of her response, I contacted an H.R. rep to see if it were mandatory that I work over my scheduled hours. I was told that as long as I met my obligations as a supervisor that I would be fine. Later, after feeling continued pressure from my Director I spoke with the same rep about my FMLA. She said that if I should continue to have problems with my Director to let her know, well I thought that I was doing just that. My Director knew that my dad didn't have long and that I still did my job and did it well. However, now; one of the Managers went out on an LOA and my Director gave me her responsibilities as well, on top of my responsibilities. I had never been trained to do the managers job, nor was I being paid extra to do so. However, I tried my best. Unfortunately, everything got the best of me and I had a breakdown and I had to be hospitalized for several days. Once I was stabilized, I called the Manager to tell her where I was and I also told her my condition. My mind was still cloudy and foggy and I was unsure of my next steps as they related to my care. After I was released, maybe two weeks approx, had gone by and I checked my work E-mail.

There was an E-mail that was sent to the entire staff stating that my position had been eliminated due to financial reasons. I couldn't believe what I had read. I received the budgets every month and we were tens of thousands in the black each month. My position was eliminated and I was laid off because I had been hospitalized. The hospital has specific policies, which I know so well

regarding lay-offs. None of which were followed.

Also my Hippa rights were violated. Around

April 3 approx, a former employee of William Beaumont Hospital came to my house looking for me.

This ex-employee hadn't worked for WBH for a few years. Upon her arrival at my home, I was out having lunch at the neighborhood local diner. She located me there, as my fiancée had told her where I was. My children and I saw her as we were leaving the diner.

She came up to me, hugged me, and said

"I am so sorry to hear that you were in the hospital, I know that it must have been something really really bad to put you on the psych ward." I was taken back. My kids were there. They over heard this. My thought was how the heck did she know. WBH has

a confidentially policy which includes a statement which says a patient's NAME, Diagnoses, or other information relating to a patient shall be released.

My kids are old enough to know what a psych unit is. So I had to explain mommy's condition, Major Depression. A few days after this event at the

diner, I called her to see where she had gotten her information, because it bothered me, and she stated/named two of WBH current employees who told her. I feel violated on all ends by WBH. All of this because I was trying to be everything for everyone

My FMLA rights were violated  
my H-PPA rights were violated

They did not adhere to their own  
HIPPA policy

They did not adhere to their own  
Lay-Offs policies

And I was discriminated against because  
of my condition, after 20yrs. 20yrs

Pay practices were violated

I would like for the court to find in my  
favor and rule that my rights were violated  
and that I was clearly discriminated against.

I would also like for the court to have  
William Beaumont Hospital give me my job  
back or compensate me for my loss wages  
and punitive damages that I have sustained  
or exemplary damages + pain and suffering

I would also ask that Kathy Grady be made  
to attend some seminars or classes on  
How To Interact with Others. as well as  
the DO's and DON'T's of professionals.  
She really, really needs these classes.

Therefore, I am filing this Civil  
complaint against WBH (William  
Beaumont Hospital) for the forementioned  
reasons

Signature of Filer

Street Address

City, State, Zip Code

Telephone Number

3.10.12

Date

25326 Wessix

Street Address

City, State, Zip Code

248 229 2135

Telephone Number

JS 44 (Rev. 09/11)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

Angela E. Lockett  
25326 Wessex, Farmington Hills, MI 48336

(b) County of Residence of First Listed Plaintiff Oakland  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

**DEFENDANTS**

William Beaumont Hospital and Kathy Grady  
3601 W. 13 Mile Road, Royal Oak, MI 48073

County of Residence of First Listed Defendant Oakland  
(IN U.S. PLAINTIFF CASES ONLY)

N OF

Case:2:12-cv-11064

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MJ: Hluchaniuk, Michael J.

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**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   |                                       |                                       |   |                            |                                       |
|---|---------------------------------------|---------------------------------------|---|----------------------------|---------------------------------------|
|   | PTF                                   | DEF                                   |   | PTF                        | DEF                                   |
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input type="checkbox"/> 2            | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5            |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6            |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER REMEDIES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input checked="" type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee (Prisoner Petition) <input type="checkbox"/> 465 Other Immigration Actions	<b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

**V. ORIGIN**

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

**VI. CAUSE OF ACTION**

Brief description of cause:

Employee laid-off (position eliminated) as her disability became known, also organization violated her HIPPA rights

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

3-10-12

SIGNATURE OF ATTORNEY OF RECORD

**FOR OFFICE USE ONLY**

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

☐ Yes  
☒ No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

☐ Yes  
☒ No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

Notes :

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